



April 25, 2017

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: NOTICE OF EX PARTE
WT Docket No. 10-208: *Universal Service Reform - Mobility Fund*

Dear Ms. Dortch:

On April 21, 2017, Courtney Neville and I of Competitive Carriers Association (“CCA”)¹ met with Nese Guendelsberger, Jim Schlichting, Margaret Wiener, Rita Cookmeyer, Jonathan McCormack, Paroma Sanyal (via phone), Kelly Quinn (via phone), and Audra Hale-Maddox (via phone) of the Wireless Telecommunications Bureau; Chelsea Fallon, Michael Janson, Kirk Burgee, and Thom Parisi of the Rural Broadband Auctions Task Force; James Miller of the Office of Engineering & Technology (via phone); and Henning Schulzrinne of the Office of Strategic Planning & Policy Analysis (via phone), regarding the above-referenced proceeding. CCA discussed how the Commission should adopt and implement a robust, targeted challenge process to efficiently identify areas eligible for Mobility Fund II support.²

CCA encouraged the FCC to anchor its Mobility Fund II funding decisions on accurate service data and a sound challenge process,³ and reiterated its recommendation that the Commission adopt data collection standards to ensure that evidence supporting final determinations for areas

¹ CCA is the nation’s leading association for competitive wireless providers and stakeholders across the United States. CCA’s membership includes nearly 100 competitive wireless providers ranging from small, rural carriers serving fewer than 5,000 customers to regional and national providers serving millions of customers. CCA also represents approximately 200 associate members consisting of businesses, vendors, and suppliers that serve carriers of all sizes.

² *Connect America Fund, Universal Service Reform – Mobility Fund*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket Nos. 10-90 & 10-208 (rel. Mar. 7, 2017) (“*Report and Order*” or “*Further Notice*”).

³ See Letter from Sens. Wicker (R-MS) and Manchin (D-WV), U.S. Senate, to The Hon. Ajit Pai (Apr. 12, 2017), available at https://www.wicker.senate.gov/public/_cache/files/d2d30dd8-76f2-4c45-8d3a-b64c9018265c/041217-fcc-rural-broadband-auctions-task-force-letter.pdf (noting that “coverage data that accounts for the actual consumer experience in our rural communities is a necessary step in the effort to close the digital divide”).

eligible to receive Mobility Fund II support is clear, rigorous, and above all, reliable.⁴ To ensure that limited resources allocated for Mobility Fund II are put to their best use, the FCC must standardize inconsistent underlying data to present on-the-ground broadband coverage that reflects consumers' actual mobile experiences. In seeking to meet this goal, the Commission should delineate certain factors by which providers are able to determine coverage, including resolution, propagation model, loss assumptions and performance levels, to name a few.⁵ The Commission should ensure accurate substantive results by requiring evidence submitted by challengers and challenged carriers to be clearly defined, robust, and reliable.

CCA also encouraged the FCC to provide a sufficient amount of time for carriers to accurately and wholly respond during the challenge process, and recommended that the Commission adopt a procedure that does not burden smaller carriers with limited resources. The FCC's creation of an inclusive, robust data collection method and challenge process will ensure Mobility Fund II funds are responsibly dispersed to advance ubiquitous mobile broadband coverage.

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules. Please do not hesitate to contact me with any questions or concerns.

Respectfully submitted,

/s/ Rebecca Murphy Thompson

Rebecca Murphy Thompson
EVP & General Counsel
Competitive Carriers Association

cc (via email): Nese Guendelsberger
Jim Schlichting
Margaret Wiener
Rita Cookmeyer
Jonathan McCormack
Paroma Sanyal
Kelly Quinn

Audra Hale-Maddox
Chelsea Fallon
Michael Janson
Kirk Burgee
Thom Parisi
James Miller
Henning Schulzrinne

⁴ See *ex parte* Letter from Rebecca Murphy Thompson, EVP & General Counsel, Competitive Carriers Association, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 10-208 et al., at 2 (filed Feb. 17, 2017).

⁵ See *ex parte* Letter from Trey Hanbury, Counsel to Competitive Carriers Association, Hogan Lovells US LLP, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 10-208 et al., at 3 (filed Oct. 25, 2016) (noting that "[a]s a result of these and other flaws, the Form 477 data provides an unreliable view of mobile broadband coverage, particularly in rural areas and areas of low-population density").